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March 10, 2020

VIA ECF

Honorable George B. Daniels, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Kroustallis, et al. v. City of New York, et al.
16 Civ. 8421 (GBD)
Smyth, et al. v. City of New York, et al.
17 Civ. 492 (GBD)
Henry, et al. v. City of New York, et al.
16 Civ. 9971 (GBD)

MAR 10 2020

SO ORDERED
The status conference is
adjourned from March 11,
2020 to May 6, 2020 at 9:45
a.m.
George B. Daniels
HON. GEORGE B. DANIELS

Dear Judge Daniels:

This firm is counsel to Plaintiffs in the above referenced related actions. I write, on consent of all parties, to request an adjournment of the scheduled March 10, 2020 status conference to a date that is convenient to the court.

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This adjournment is requested for several reasons. Initially, Plaintiffs' undersigned counsel has been out of the office on paternity leave, and only returned yesterday. During the paternity leave, Defendants' counsel provided a large number of documents which Plaintiffs' counsel has not as yet had the opportunity to review, and more document production remains forthcoming. Additionally, Plaintiffs' counsel is coordinating the production of documents to Defendants' counsel, but has not had the opportunity to provide documents as a result of the paternity leave. The parties continue to engage in the process of providing documentary responses to each other in accordance with the Court's prior orders, which include responses for close to a thousand individual plaintiffs. The parties anticipate having a clearer time schedule for the completion of document production some time in April, after which the parties will be better able to inform the court as to the status of discovery.



VIRGINIA
& AMBINDER LLP

Respectfully submitted,

/s/ _____
James Emmet Murphy

cc: Ivan Mendez, Esq. (via ECF)
Shawna MacLeod, Esq. (via ECF)